

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

ABEL AMBROCIO,

Defendant.

No. 1:20-cr-135

Honorable Anthony J. Trenga

STATEMENT OF FACTS

The United States and the defendant, Abel Ambrocio (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. At all times relevant to this Statement of Facts, the defendant resided in Alexandria, Virginia, which is within the Eastern District of Virginia.

2. From at least October 2018 through at least February 2019, in the Eastern District of Virginia and elsewhere, the defendant attempted to and did in fact use two minors to engage in, and have these two minors assist another adult to engage in, sexually explicit conduct for the purpose of producing visual depictions of that conduct, and these visual depictions were actually transmitted using a means of interstate and foreign commerce—namely, the internet—in violation of 18 U.S.C. § 2251(a) and (e).

3. Specifically, in around March 2018, using an online social media account under a different name, the defendant began communicating using the internet with another individual who he understood to live outside the United States. During the course of these communications, the individual sent the defendant nude images of herself and developed an online relationship with the defendant.

4. Beginning in at least October 2018 and continuing through at least February 2019, the defendant instructed the individual to record and send him over the internet digital images of two minors—MINOR VICTIM 1, who was approximately three years old, and MINOR VICTIM 2, who was approximately ten years old—engaged in specific instances of sexually explicit conduct.

5. For example, on or about November 14, 2018, during the course of this online conversation, the defendant instructed the individual to record and send him images of herself performing oral sex on MINOR VICTIM 1 and images of MINOR VICTIM 1 performing oral sex on her. In response to the defendant's instructions, the individual transmitted to the defendant over the internet multiple images of herself with her mouth on MINOR VICTIM 1's genitals and of herself pressing MINOR VICTIM 1's face against her vagina. The defendant then instructed the individual to digitally penetrate MINOR VICTIM 1 and, in response, the individual sent the defendant multiple images of herself digitally penetrating MINOR VICTIM 1's anus.

6. Additionally, on or about November 12, 2018, the defendant used his online social media account to instruct the individual to insert an object into MINOR VICTIM 2's anus. In response, the individual transmitted multiple images to the defendant over the internet depicting herself inserting an object into MINOR VICTIM 2's anus. After receiving the images, the defendant instructed the individual to insert the object further into MINOR VICTIM 2's anus and to position MINOR VICTIM 2 so that the object could more easily penetrate MINOR VICTIM 2's anus. After the individual informed the defendant that MINOR VICTIM 2 was in pain and crying, the defendant instructed the individual to send him one more image of herself penetrating MINOR VICTIM 2's anus with the object, which the individual then did. The defendant then instructed the individual to send him an image of MINOR VICTIM 2's anus and an image of

herself digitally penetrating MINOR VICTIM 2's anus. In response, the individual transmitted two images depicting the requested content to the defendant.

7. On multiple occasions from at least October 2018 through February 2019, the defendant instructed the individual to record and send him images of MINOR VICTIM 1 and MINOR VICTIM 2 engaged in similar sexually explicit conduct. Based on these instructions from the defendant, the individual transmitted to the defendant over 100 images of the two minors engaged in such conduct during this timeframe—including, for example, images of herself digitally penetrating MINOR VICTIM 1's anus and images of herself penetrating MINOR VICTIM 2's anus and vagina with an object.

8. Additionally, in March 2019, after the individual provided the defendant with the log in credentials for a different online social media account, the defendant logged into the account and sent another user multiple images of the individual, including images of the individual with her mouth on MINOR VICTIM 1's anus and genitals.

9. In or around February 2020, the defendant agreed to speak with law enforcement at his home in Alexandria, Virginia, and admitted that he communicated with the individual through an online social media account and had asked her to take and send him images of herself engaging in sex acts with MINOR VICTIM 1 and MINOR VICTIM 2. Evidence of the defendant's online communications with this individual was recovered from his LG Cell Phone model LS755.

10. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

11. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Raj Parekh
Acting United States Attorney

Date:

By:



William G. Clayman
Special Assistant United States Attorney (LT)

By:



Jonathan S. Keim
Assistant United States Attorney

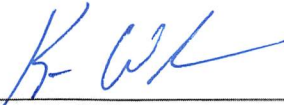
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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Abel Ambrocio, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Abel Ambrocio

I am Kevin E. Wilson, the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Kevin E. Wilson
Attorney for the Defendant